

UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA

3

06

Robert C. Robinson III  
Plaintiff

v.

Verizon  
Defendant

COMPLAINT

FILED

OCT 26 2006

MICHAEL E. KUNZ, Clerk  
By [Signature] Dep. Clerk

- 1.) Fill in your address (street, city or town, state, and zip code):

7209 BRAD Rd Philadelphia PA 19135

- 2.) Defendant's address is (street, city or town, state, and zip code):

1350 N Water St Welsh Rd W. Wales PA

- 3.) Statement of Claim:

Fill in the facts of your case, and state why you are filing this lawsuit. Give names, dates, and places as best you can.

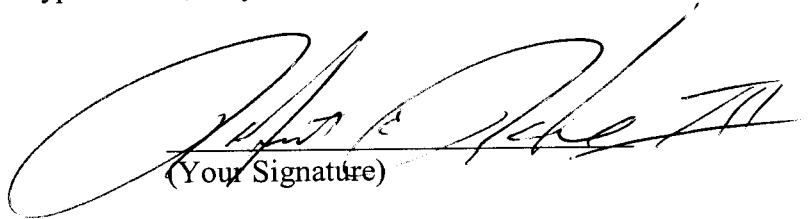
I am filing based on discrimination  
Both managers Kerrie D'1672 local manager  
Dwaine Bonifacio - local manager & public  
Elton Supervisor all of this discriminated  
by not giving my Assistant the proper  
task & daily job functions - Supervisor  
Would never Address me by name  
Please see Attached letter.

- 4.) Fill in what you are requesting in this case:

I am requesting back pay. Attorney fees  
paid and court cost.

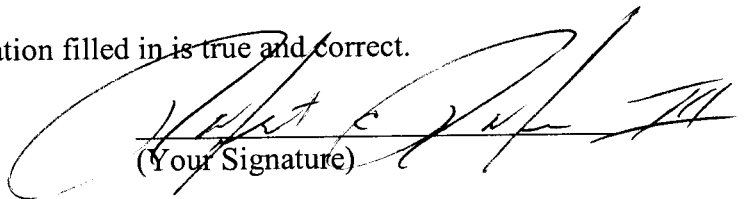
- 5.) If you filed charges with the Equal Employment Opportunity Commission or with the Pennsylvania Human Relations Commission, please attach a copy of the Notice-of-Right-to-Sue letter.

- 6.) If there is a right to a jury trial in your type of case, do you want one?  
Yes ☒ No ☐

  
(Your Signature)

I declare under penalty of perjury that the information filled in is true and correct.

10-23-06  
(Date)

  
(Your Signature)

On April, 18, 2005 I Robert C Robinson III was hired as a Maintenance Administrator for Verizon Communications located at 1350 N Welsh rd. Upon my hiring I spoke with a recruiter Ms. Janet Polumbo who informed me that I would be working in a hostile environment and that I was not wanted at that location by management and the supervisor, so I was what she called a force hire at that location. Due to my financial position as I explained to Ms. Polumbo I accepted this position with the hopes that once when management had a chance to meet me they would change the way they felt about me even though we have never met nor did I know anyone whom worked at that location.

Once I arrived at the North Wales location I quickly discovered that I was the only male as well as the only African American male in my department. I was told that I would be reporting to a Ms. Gwenn Bonvino whom I only reported too for a month and I was told to report to Ms. Kerrie D'lutz. My first month and a half my job functions consisted of bringing up paper, faxing, mailing, handing out mail, and filing, nothing of which a Maintenance Administrator is supposed to do as described in the Verizon handbook. While introducing myself to everyone in the office because management did not I met a young lady who was hired a week or two before me Ms. Parrella Long, and I noticed that she was getting training to perform her actual function as a M/A so at this point I made no comment because I thought maybe in two weeks my function would change as well, it did not change not even after Laurane McAvaine went out with back surgery or when Ruth quit I was still left doing the odd jobs around the office while Ms. Long received training on how to do pay roll time sheets and error reports. It wasn't until Ms. Shirley Robinson went on vacation that I received a new job function and that was more than a month and a half into my time working there. Ms Robinson was in charge of the customer complaint line as well as the Ariel and Burial reports, I was told a week prior by management that she would be going on vacation and no one other than Ms. Robinson showed me how to perform her job, no one from management sat next to me like they have been doing with Ms. Long no other than Ms. Robinson gave me notes on the function I received nothing. If it wasn't for me approaching Ms. Robinson and asking about how and what is all included I would have not been prepared to do this job function to perfection, so during the time that I had between filing and my other functions I sat next to Ms. Robinson and she also had done the same with me in return, she was very helpful and informative on making sure that I received all the info I needed to perform this function, she was also aware that management would not help me and she and I both thought that this was wrong, but this would be only the beginning of this neglect by management.

Once when Ms. Robinson returned back from vacation I was back to doing my old functions the same ones that I performed while I was doing Ms. Robinson's job function. I received my first months review and I was told everything was great and that I would receive a does meet rating for my first months review. On June 27, 2005 I was given the task of doing Time Sheets and Payroll, prior to receiving this task there was no training for this and all I was told was to type what I see on the sheets. This caused a bit of concern for me because there was codes that I did not know what they were nor did I have the proper information on how to input these codes or what they meant as well as whom to contact if there was a problem with the techs time sheets. So during this learning

process I would consistently get up and ask Ms. Mary Troxell who has been with the company for over 30 years when it was Bell Atlantic and she was very informative and helpful, she would also help me log into the systems since I did not have my own sign on password or Verizon id as well as my own instant messaging e-mail account, verses Ms. Long whom had all of these necessities to perform her job as well as perform it on time. I would have to wait until Ms. Troxell was available to sign me on to the system or some of the other women in the office would have to stop what they were doing and come and sign me into the systems, these women included Ms. Joan Collins, Ms. Leeann McCain, and Ms. Gwenn Bonnvino Manager, by not having my own sign own assured management that I would not get my work started on time so knowing this I immediately went to the union and filed a grievance on both no proper training for this task, no info given for the task, no sign on to the systems, and the attempt to hold me accountable for any mistakes or errors that would come about. This was only done with me as I explained to the union rep, I noticed that management would correct Ms. Longs errors and provide her with the proper information needed to do her task, as well as there were many times she was late and Gwenn Bonnvino and Kerrie D'lutz would sneak her in the building.

So a meeting was held between me, Kerrie D'lutz management, and Bert Broussard my union rep, these issues was talked about in the meeting but after it was all said and done nothing changed as far as me receiving any new information or changes to the codes on the time sheets and payroll, as well as any e-mails that were being sent out. I would receive this information from some of the women who worked in the office with me and these women was upset that I was not receiving this information the viewed it as unfair as well as it was taking time away from them doing their work to give me the information that was needed, so after a few more grievances being filed with the union a few calls to Verizon security there was another meeting between myself, Ms. D'lutz, and Bert Broussard union rep, and again there was no change except that I received a does not meet for my monthly review in which I filed a grievance about but, management refused to change the review me and my union rep knew that this was being done as retaliation against me for going to Verizon security and the union about these issues and explaining in detail who all is involved and what was going on in the office pertaining to me.

After this meeting my tour time was change from 7:30am to 7 am this was done because Ms. Long was coming in late and they figured by having me come in early and her later that it would resolve her tardiness problem and have me arrive late all this came about the same time that I had mentioned to management that I was without a car for a little while, so I would take the train to work walk a few miles or ride my bike to get into work on time I even went farther by moving from West Philadelphia to Elkins Park, Pa to be closer to 309 express way and the train station. I had done this for a few weeks when a co-worker Jean Grater offered to pick me up and drop me off at the train station after a while Ms. D'lutz also offered to do the same. This went on for 3 weeks until my purchase of a new vehicle.

As time went on their was more attempts to keep me in the dark of any new changes and updates to the system and time and payroll sheets, When ever there was and error on my groups whom I had the second largest group of guys behind Ms. Tonya

Johnson my supervisor Ms. Marie Elton would refer to me indirectly as the situation, him, or it. I could clearly hear these remarks since I was only sitting a few feet away from her desk I found this to be not only upsetting but disturbing and when these issues was brought to the union and a meeting was called she would never show she would in return send one of the other managers in her place, now at this point there was and attempt to have a manager sit with me at my desk and try to help me with my time sheets the only problem was that Ms. D'lutz never typed time sheets and knew no more than I did about them we both would go to Ms. Troxel for assistance so I would ask myself how is this helping me when she and I knew pretty much the same if not I knew a little more than she did about typing time and this was by asking questions, taking notes, and using the info that was shared with me by the other women in the office. As time went on no matter how good I performed I would always receive a needs improvement or does not meet, so I made several complaints about this to my union and they asked for a meeting and proof of poor performance at all the meetings their was no proof of poor performance, and management would still refuse to change my performance grade. This would continue for my next few reviews.

On Oct,11,2005 we had a so called security violation in the office I arrived at the North Wales office at 7 am as did Mr. Michael S Clark, as he said to me he had went to sit down and begin to do his work on his computer terminal when he noticed that my personal information was displayed on his screed he immediately came over to my desk asked me my last name after I told him it was Robinson he asked me to come to his desk and take a look at his screen, so I got up from my desk went to see what he was talking about and on his computer terminal was all my personal information such as what was spoken about between management and the union, social security number, and address, as well as some disturbing pages that clearly stated that management was planning to fire me since April as it was written in one of the letters. So I printed out the information and gave a copy to my union rep Ms. Bert Broussard and management, we had a meeting and nothing could be explained. Later that day I was typing my group of time sheets into the new system that had replaced the old one two to three weeks prior which was called T.M.R it made the information more easy to input so what I started to do was make copies of all my work and go over it later or have it ready so when the garage bosses asked for something to be changed I can have it ready, by doing this I was able to track my information more accurately. I noticed that day that all of my groups that were being typed was later being deleted out of the system so I went to both management and my union with this complaint, now it seemed strange at this point because normally when something like time is missing or not typed in the system on time it would be panic all threw the office not this day though they were all cool and volunteered to re-type the information themselves I found this to be strange and disturbing but I held on to my copies proving that it was typed, and someone had to delete it out of the system. My vacation time had just kicked in because I was after my six months probation I had received my raise and took a few days off. While on vacation I received numerous calls from Ms. D'lutz asking me to cut my vacation short to come in for what reason it was never explained. I did not I was away and I would return back to the office when my vacation were over. When I returned back to the office I was greeted by Verizon security who wanted to ask me questions about the October, 11 incident, the security officers tried